

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LESLIE JACK, individually and as Personal  
Representative of PATRICK JACK; DAVID  
JACK, individually,

Plaintiffs,

v.

ASBESTOS CORPORATION LTD., et al.,

Defendants.

No.: 2:17-cv-00537-JLR

STIPULATION AND ~~PROPOSED~~ ORDER  
EXTENDING EXPERT DISCLOSURE  
DEADLINE FOR DR. GODWIN REPORT

Defendant M.W. Custom Papers, LLC requests, and Plaintiffs do not oppose,  
extending the deadline for Disclosure of Expert Testimony under FRCP 26(a)(2) with respect  
to Defendant's expert, Dr. David Godwin, by two weeks -- from the current deadline of April  
18, 2018 to May 2, 2018.

Plaintiffs bring this action against MWCP and others alleging that exposure to  
asbestos caused the death of Patrick Jack ("Mr. Jack"), due to mesothelioma.

Dr. Godwin is a board certified radiologist and a certified B-reader. Dr. Godwin is  
expected to testify as to radiologic methods and techniques of diagnosis, which may include  
chest X-rays, CT scans, thin slice CT scans and ventilation perfusion scans. Dr. Godwin  
may testify as to his interpretation of the abnormalities, if any, found in radiologic studies of  
Mr. Jack.

1 Despite diligent efforts, including repeated follow up and requests to expedite,  
2 MWCP has been unable to obtain Mr. Jack's radiology for Dr. Godwin's review. Plaintiffs'  
3 counsel provided releases for medical records on March 13, 2018, designating Written  
4 Deposition Services, Inc. as the records service. Bullivant Houser Bailey requested records  
5 through Written Deposition Services on March 14, 2018. On April 4, 2018, Bullivant  
6 expedited the request and has since followed up repeatedly. Bullivant is told that films from  
7 at least one provider are now on the way.

8 Plaintiffs do not take a position on the foregoing, but do not oppose this extension.

9 **STIPULATION**

10 Plaintiffs and defendant M.W. Custom Papers, LLC, by and through their respective  
11 counsel of record, hereby stipulate and agree that the deadline for Disclosure of Expert  
12 Testimony under FRCP 26(a)(2) with respect to Defendants' expert, Dr. Godwin, may be  
13 extended two weeks from the current deadline of April 18, 2018 to May 2, 2018.

14 DATED this 17<sup>th</sup> day of April, 2018.

15 DEAN OMAR & BRANHAM, LLP

BULLIVANT HOUSER BAILEY PC

16  
17 By: /s/ Benjamin H. Adams  
Benjamin H. Adams, \_\_\_\_\_  
18 Attorney for Plaintiff

By: /s/ Katherine M. Steele  
Katherine M. Steele, WSBA #11927  
Attorney for M.W. Custom Papers, LLC

**ORDER EXTENDING EXPERT DISCLOSURE DEADLINE**

The Court having considered the Stipulation by the Plaintiffs and defendant M.W. Custom Papers, LLC, and being fully advised in the premises, now, therefore hereby ORDERS that the deadline for Disclosure of Expert Testimony under FRCP 26(a)(2) with respect to Defendant's expert, Dr. Godwin, is extended two weeks from the current deadline of April 18, 2018, to May 2, 2018.

DATED this 19<sup>th</sup> day of April, 2018

  
THE HONORABLE JAMES L. ROBART

Presented by:

BULLIVANT HOUSER BAILEY PC

By: /s/ Katherine M. Steele  
Katherine M. Steele, WSBA #11927  
Attorneys for M.W. Custom Papers, LLC

*Approved as to form and content:*

DEAN OMAR & BRANHAM, LLP

By: /s/ Benjamin H. Adams  
Benjamin H. Adams, \_\_\_\_\_  
Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

**(Jack)**

I hereby certify under penalty of perjury under the laws of the State of Washington that on April 17, 2018, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system, which will send notification of such filing to all counsel of record who receive CM/ECF notifications.

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